REMARKS

In the Office Action[1], the Examiner objected to claim 8; rejected claims 5-8 under

35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,724,403 to Santoro et al.

("*Santoro*"); rejected claims 1, 3, 4, and 9 under 35 U.S.C. §103(a) as unpatentable over

Santoro in view of U.S. Patent Application Pub. No. 2002/0078447 to Mizutome et al.

("*Mizutome*"); and rejected claim 2 under 35 U.S.C. §103(a) as unpatentable over

Santoro, in view of *Mizutome*, and further in view of WO 01/39494 to Escobar et al.

("*Escobar*").

Regarding the objection to claim 8, Applicant has amended claim 8 to recite a

"distribution method." Therefore, Applicant requests that the Examiner withdraw the

objection to claim 8.

Applicant respectfully traverses the rejection of claims 5-8 under

35 U.S.C. § 102(e) as being anticipated by *Santoro*. In order to properly establish that

Santoro anticipates Applicant's claimed invention under 35 U.S.C. § 102, each and

every element of each of the claims in issue must be found, either expressly described

or under principles of inherency, in that single reference. Furthermore, "[t]he identical

invention must be shown in as complete detail as is contained in the ... claim." *See*

M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9

U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

Claim 5 recites an electronic equipment comprising, for example:

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[1] The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicant declines to automatically subscribe to any statement or characterization in the Office Action.

a script text storage unit for storing a plurality of script texts, containing at least <u>a media element identification of visual media information to be input into an electronic equipment from one of a plurality of interfaces, an external source information of the media element, a display layout of the media element on a display screen, and an indication of a type of equipment connected to at least one of the plurality of interfaces</u>;

<u>a recognition means for recognizing a characteristic of the electronic equipment</u>;

<u>a script text customizing means for customizing at least one of the plurality of script texts according to the characteristic of the electronic equipment</u>;

(emphasis added). *Santoro* fails to teach or suggest at least the claimed "script text storage unit," "recognition means," and "script text customizing means."

Santoro discloses a graphical environment including a grid of tiles (col. 4, lines 34-54). As depicted in Fig. 7 of *Santoro*, grid 700 comprises a matrix of tiles 702, 704, 706, 708, and 710 that are associated with different content, and grid 700 "controls the layout and priorities of the tiles" (col. 10, lines 53-54). The data structure of the tiles includes tile address 502 "that defines the location of the file system where the tile image is stored" and target address 504 "that is the location at which the file or application program associated with the tile can be found" (col. 9, lines 62-65).

The Examiner appears to assert that the language used to create the tiles in *Santoro* corresponds to the claimed "script texts." The Examiner also states that col. 10, lines 41-67 of *Santoro* discloses the claimed "plurality of script texts" that contain "a media element identification of visual media information to be input into an electronic equipment from one of a plurality of interfaces, an external source information of the media element, a display layout of the media element on a display screen, and an

indication of a type of equipment connected to at least one of the plurality of interfaces" (Office Action at page 3). This is not correct.

According to this passage of *Santoro*, grid 700 comprises a matrix of tiles 702, 704, 706, 708, and 710 that are associated with different content, such as a browser, Real Player, CD-player, and word processor. Applicants find no teaching or suggestion in this passage or any other passage of *Santoro* that the language used to create the tiles includes 1) "a media element identification of visual media information to be input into an electronic equipment from one of a plurality of interfaces," 2) "an external source information of the media element," 3) "a display layout of the media element on a display screen," and 4) "an indication of a type of equipment connected to at least one of the plurality of interfaces."

Therefore, *Santoro* does not teach or suggest the claimed combination of elements including, for example, "a script text storage unit for storing a plurality of script texts, containing at least a media element identification of visual media information to be input into an electronic equipment from one of a plurality of interfaces, an external source information of the media element, a display layout of the media element on a display screen, and an indication of a type of equipment connected to at least one of the plurality of interfaces," as recited in claim 5.

Col. 22, lines 1-37 of *Santoro* discloses interaction between a client device 2400 and a server 2402. Grid generator 2404 "creates a grid of tiles according to user-specified content" (col. 22, lines 9-10). When the user logs on, the server retrieves the grid setting specific to the user. Creating a grid of tiles and retrieving the grid does not teach or suggest "recognizing a characteristic of the electronic equipment."

Moreover, while the user in *Santoro* may specify content, *Santoro* does not contemplate "customizing" at least one of the script texts "<u>according to the characteristic of the electronic equipment</u>." Therefore, *Santoro* also does not teach or suggest the claimed combination of elements including, for example, "a recognition means for recognizing a characteristic of the electronic equipment" and "a script text customizing means for customizing at least one of the plurality of script texts according to the characteristic of the electronic equipment," as further recited in claim 5.

Accordingly, *Santoro* does not anticipate claim 5, and claim 5 is allowable. Claim 6 is also allowable at least due to its depending from claim 5. Independent claim 7 and dependent claim 8, while of different scope, are allowable for at least the same reasons discussed above in regard to claim 5.

Applicant respectfully traverses the rejection of claims 1, 3, 4, and 9 under 35 U.S.C. § 103(a). The prior art cited by the Examiner, *Santoro* and *Mizutome*, does not teach or suggest each and every element of claims 1, 3, 4, and 9. A *prima facie* case of obviousness has, therefore, not been established.

Claim 1 recites an electronic equipment comprising, for example:

> script text acquisition means for acquiring a plurality of script texts, containing at least <u>a media element identification of the visual media information to be input from one of the interfaces, an external source information of the media element, a display layout of the media element on the display screen, and an indication of a type of equipment connected to at least one of the plurality of interfaces</u>;
>
> . . .
>
> an interface selection means for identifying the external source of the media element <u>based on the external source information contained in the script text selected by the script text selection means</u> and selecting one of the plurality of interfaces corresponding to the identified external source to input the media element;

(emphasis added). *Santoro* and *Mizutome*, even if combined as suggested by the Examiner, fail to teach or suggest at least the claimed "script text acquisition means" and "interface selection means."

As previously stated, *Santoro* does not teach or suggest the combination of a "plurality of script texts" that contain "a media element identification of visual media information to be input into an electronic equipment from one of a plurality of interfaces, an external source information of the media element, a display layout of the media element on a display screen, and an indication of a type of equipment connected to at least one of the plurality of interfaces" and an "interface selection means for identifying the external source of the media element based on the external source information contained in the script text selected by the script text selection means," as recited in claim 1.

Mizutome does not cure the deficiencies of *Santoro*.

Mizutome discloses "a data processing apparatus for displaying or outputting information regarding a video, audio, and so on" (paragraph 0012). *Mizutome* does not teach or suggest the claimed combination of elements including, for example, "a plurality of script texts" that contain 1) "at least a media element identification of said visual media information to be input from one of said interfaces," 2) "an external source information of the media element," 3) "a display layout of said media element on said display screen," and 4) "an indication of a type of equipment connected to at least one of the plurality of interfaces."

Moreover, *Mizutome* is also silent regarding the claimed combination of elements including, for example, an "interface selection means for identifying the external source

of said media element based on the external source information contained in said script text selected by said script text selection means and selecting one of said plurality of interfaces corresponding to the identified external source to input said media element" and "a layout presenting means for presenting layout options based on the plurality of script texts," as further recited in claim 1.

Accordingly, *Santoro* and *Mizutome* fail to establish a *prima facie* case of obviousness with respect to claim 1. Claims 3, 4, and 9 are also allowable at least due to their depending from claim 1.

Regarding the rejection of claim 2, dependent from claim 1, the Examiner relies on *Escobar* for allegedly disclosing "virtual channels" (Office Action at page 6). Even assuming this allegation is correct, which Applicants do not concede, *Escobar* fails to cure the deficiencies of *Santoro* and *Mizutome* discussed above.

Escobar does not teach or suggest the combination of a "plurality of script texts" that contain "a media element identification of visual media information to be input into an electronic equipment from one of a plurality of interfaces, an external source information of the media element, a display layout of the media element on a display screen, and an indication of a type of equipment connected to at least one of the plurality of interfaces" and an "interface selection means for identifying the external source of the media element based on the external source information contained in the script text selected by the script text selection means," as recited in claim 1 and required by dependent claim 2.

Therefore, no *prima facie* case of obviousness has been established, and claim 2 is also allowable over *Santoro, Mizutome* and *Escobar* for at least the same reasons as claim 1.

In view of the foregoing, Applicant respectfully requests reconsideration and withdrawal of the rejections. Pending claims 1-9 are in condition for allowance, and Applicant requests a favorable action.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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Dated: October 24, 2008   By:___/David W. Hill/_____
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                                        Reg. No. 28,220